

### **REMARKS/ARGUMENTS**

Applicant thanks the Examiner for taking the time to discuss the subject application telephonically. Claims 2-15 remain in the subject application, claims 16 and 17 have been added. Claims 2 – 13 and 15 are amended, as recited hereinabove.

Claims 2-15 have been rejected under 35 U.S.C. 102(e) as being allegedly anticipated by Hasbun et al. (5,586,285). However, unlike Hasbun et al., the claimed invention teaches “writing data for the one or more sectors of data to be rewritten to one or more new blocks identified by the same group of logical block addresses without moving and without copying the data ...” Furthermore, “one or more blocks caused to be identified by a group of logical block addresses corresponding to a predetermined group of sectors”. In the office action, at page 4, it is stated that the limitation ‘a group of logical block addresses corresponding to a predetermined group of sectors’ is still sufficiently broad that it reads on all logical addresses within the system of Hasbun et al.”

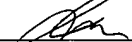
However, as stated during the telephonic discussion, Hasbun et al. is not believed to teach “one or more blocks being identified by a group of logical block addresses”, rather, it is believed that Hasbun et al. discloses a sector of data identified by logical sector number (LSN) and even if each block, in Hasbun et al. is associated with a plurality of LSN’s, this is not “identifying one or more blocks by a group of logical block addresses corresponding to ...”, as recited in the claimed invention. That is, the LSN in Hasbun et al. identifies a sector not one or more blocks. Additionally, Hasbun et al. is not believed to disclose “identification of the one or more new blocks by the same group of logical block addresses”, as does the claimed invention [emphasis added]. Moreover, the claimed invention avoids moving and copying the sectors of data in the sectors in the one or more blocks that the host did not specify to be rewritten thereto.

It is therefore believed that independent claims 2, 3, 7, 11 and 15 are patentable over Hasbun et al. and all claims depending therefrom are also necessarily patentable over Hasbun et al. It is further believed that newly-added claims 16 and 17 are patentable.

Reconsideration and allowance of claims 2-15 is hereby respectfully requested.  
Consideration and allowance of claims 16 and 17 is hereby respectfully requested. Applicants submit that the subject application is now in condition for allowance and an early notice thereof is respectfully requested. Should any further amendment be required prior to passing the application to issue, the Examiner is respectfully invited to contact the undersigned by telephone at the number set out below.

Respectfully submitted,  
LAW OFFICES OF IMAM

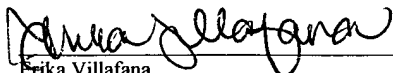
Dated: May 5, 2004  
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I hereby certify that this correspondence with all attachments is being deposited with the U.S. Postal Service as first class mail in an envelope addressed to: Mail Stop Fee Amendment, Commissioner for Patents, P.O. Box 1450, Arlington VA 22313-1450 on May 5, 2004 by Erika Villafana.

May 5, 2004

  
Erika Villafana